

Exhibit I

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK, ss SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

ARTHUR J. GALLAGHER & CO., §
§
Plaintiff, § C.A. No.:
§
v. § 2184CV02828
§
ALLIANT INSURANCE SERVICES, §
INC., DOUGLAS BIXBY, §
TINA HINCKLEY, RICHARD §
LEAVITT, JAMIE PESTER, §
and HORACE ROGERS, §
§
Defendants. §

REMOTE ORAL AND VIDEOTAPED DEPOSITION OF

MELISSA HARTFIEL

7th day of March, 2022

REMOTE ORAL AND VIDEOTAPED DEPOSITION OF
MELISSA HARTFIEL, Houston, Texas, produced as a
witness at the instance of the Plaintiff, and duly
sworn, was taken in the above-styled and numbered
cause on the 7th day of March, 2022, from 12:28
p.m. to 5:01 p.m., before Daniel J. Skur, Notary
Public and Certified Shorthand Reporter in and for
the State of Texas, reported by stenographic means
from Waxahachie, Texas, pursuant to the Federal
Rules of Civil Procedure.
Job No. CS5112897

1 P R O C E E D I N G S

2 VIDEOGRAPHER: We are now on the record
3 for the video deposition of Melissa Hartfiel. The
4 time is 12:28 p.m., March 7th, 2022, in the matter
5 of Arthur J. Gallagher & Company versus Alliant
6 Insurance Services, Incorporated, et al., Civil
7 Action Number 2184-CV-02828 being held in the
8 Commonwealth of Massachusetts.

9 The court reporter is Dan Skur. The
10 videographer is Gus Phillips, and both are
11 representatives of Veritext Legal Solutions.

12 Will Counsel please state their
13 appearances for the record, beginning with the
14 plaintiff?

15 MR. RILEY: Bob Riley for the plaintiff.

16 MS. ALEXAKIS: Georgia Alexakis for the
17 plaintiff; and with me and Mr. Riley is also Ashley
18 Hurley, a paralegal with our law firm, on behalf of
19 plaintiff.

20 MR. STEPHENS: Timothy Stephens, Morgan
21 Lewis & Bockius, for the defendants and for the
22 witness.

23 MELISSA HARTFIEL,
24 having been duly cautioned and sworn to tell the
25 truth, the whole truth and nothing but the truth,

1 testified as follows:

2 (10:00 a.m.)

3 EXAMINATION

4 BY MR. RILEY:

5 Q. Ms. Hartfiel, again, I'm Bob Riley.
6 Thanks for being here. Have you ever given sworn
7 testimony before?

8 A. No, sir.

9 Q. And what did you do to prepare yourself
10 to give sworn testimony today?

11 A. I spoke with my attorney, Tim Stephens.

12 Q. When was that?

13 A. On Friday.

14 Q. How long did you speak?

15 A. Approximately five hours.

16 Q. Did you review documents with
17 Mr. Stephens?

18 A. Yes.

19 Q. What documents did you review?

20 A. Emails.

21 Q. What emails?

22 A. A variety of them.

23 Q. From whom and to whom?

24 A. I'm sorry, can you repeat the question?

25 Q. From whom and to whom?

1 Q. On June 23rd, you emailed her and asked
2 for a copy of her current contract or employment
3 agreement, correct?

4 A. Yes. It appears I asked that, correct.

5 Q. And you told her: We will have our
6 legal team review on your behalf.

7 Do you see that?

8 A. Yes.

9 Q. So, now, do you remember getting her
10 Gallagher Employment Agreement?

11 A. I don't believe I remember getting it
12 when we sent that -- when I sent that email.

13 Q. You got it later, didn't you?

14 A. I don't recall exactly the date.

15 Q. Do you deny that you -- you, at some
16 point, saw her Employment Agreement at Gallagher?

17 A. I don't recall when I received her
18 Employment Agreement.

19 Q. When you said: We will have our legal
20 team review on your behalf, what -- what did you
21 mean?

22 A. The typical process when I am speaking
23 with candidates is to request a copy of their
24 current contract, to which I send on to legal for
25 their review.

1 Q. Why?

2 A. Because that's what I've been advised is
3 our process.

4 Q. Who told you that?

5 A. I believe that was the process told to
6 me by John Ludwig.

7 Q. So he told you any time you're
8 recruiting somebody, get their current Employment
9 Agreement, correct?

10 A. In some cases, yes.

11 Q. And then send the Employment Agreement
12 to legal, right?

13 A. Correct.

14 Q. Well, which of the cases are you
15 supposed to get the Employment Agreement and send
16 it to legal and which are the ones not? You said
17 it's only "some cases."

18 A. I would say it's typically for
19 individuals at an account executive level or above.

20 Q. Did Ms. Hinckley qualify?

21 A. Yes, based on her background and
22 experience.

23 Q. Why was sending her Employment Agreement
24 to your legal team, quote, "on your behalf,"
25 meaning her behalf?